

# FEDERAL PUBLIC DEFENDER

## DISTRICT OF NEW JERSEY

K. ANTHONY THOMAS, FEDERAL PUBLIC DEFENDER



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December 5, 2024

Honorable Brian R. Martinotti  
United States District Judge  
United States Courthouse &  
United States Post Office Bldg.  
1 Federal Square  
Newark, New Jersey 07101

Re: United States v. Trent Collier  
Docket No. 22-CR-562

Dear Judge Martinotti,

This is to respectfully request the Court's approval and entry of the attached proposed order which, directs the U.S. Marshal's Service to immediately provide defense counsel a certified copy of the detainers for Mr. Collier. We need the detainers to assist the Essex County Public Defender's Office attempt to get Mr. Collier bailed into federal custody and ensure he serves his federal sentence in a federal prison.

The U.S.M.S. was advised of the purpose of the need for a copy of the detainer but they will not provide the detainer to counsel and therefore, we resort to a Court Order.

For background purposes, Mr. Collier was arrested in September of 2021 and was on home detention for nearly three years. On May 21, 2024, Mr. Collier flew into Newark to enter his guilty plea in this federal matter. That same day, at the airport, he was arrested for unrelated charges in Essex County. Now, and for the past seven

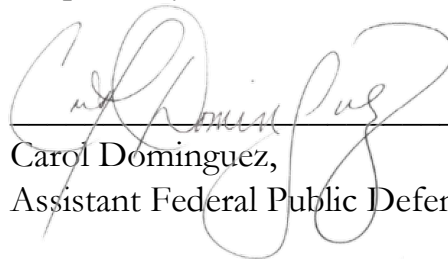
months, he has been at Essex County Jail in state custody. That state case has no resolution in sight and the Essex Public Defender's office needs to provide the detainer to the prosecutor's office before they agree to bail. If Mr. Collier is bailed in the state, he is rolled over to federal custody.

If Mr. Collier is not in federal custody by the time he is sentenced federally, he will have to first finish his state case *then*, begin his federal sentence. As it is, he is not getting a single day's credit towards his federal sentence. That amounts to a consecutive sentence that is manufactured by the tactics at play here and it is unjust and not in the interests of justice. This is especially hurtful because Mr. Collier has zero criminal history and has never been imprisoned.

It is for these reasons, and many more that we would request that Your Honor enter the attached proposed order.

The Court's thoughtful consideration is always appreciated.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Carol Dominguez", is written over a horizontal line. The signature is stylized with large, flowing loops.

Carol Dominguez,  
Assistant Federal Public Defender

Cc: Lauren Kober, A.U.S.A. – via e-mail & E.C.F.  
Enclosure

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA

v.

TRENT COLLIER

HONORABLE BRIAN R. MARTINOTTI

DOCKET NO. 22-CR-562 (BRM)

ORDER DIRECTING THE U.S.  
MARSHAL'S SERVICE TO PROVIDE  
DEFENSE COUNSEL A CERTIFIED  
COPY OF ALL DETAINERS

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This matter having come before the Court on the application of defendant, Trent Collier, through his counsel, Carol Dominguez, Assistant Federal Public Defender, and through the government, Lauren Kober, Assistant U.S. Attorney, who takes no position, for an Order Directing the U.S. Marshal's Service to Provide Defense Counsel a Certified Copy of All Detainers for Trent Collier, and for good cause shown,

IT IS ON THIS \_\_\_\_\_ day of December 2024,

ORDERED that:

The United States Marshal's Service for the District of New Jersey is directed to immediately provide defense counsel for Trent Collier a certified copy of all detainers for Trent Collier, USM #: 67299-509, all other identifiers listed herein will be redacted for E.C.F, D.O.B.: [REDACTED], SS: 1 [REDACTED] 9. SSN: [REDACTED] 9, FBI #: [REDACTED], Other ID #: [REDACTED], and PACTS #: [REDACTED].

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HONORABLE BRIAN R. MARTINOTTI  
UNITED STATES MAGISTRATE JUDGE